IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

TIG INSURANCE COMPANY)	
(as successor-in-interest to International)	
Insurance Company),)	
)	
Plaintiff,)	
)	
v.)	
)	
FKI INDUSTRIES INC. (formerly) Case No. 18-cv-00264-GKF-FHI	VI
known as Acco Babcock, Inc.), and)	
ACCO MATERIAL HANDLING)	
SOLUTIONS, INC.,)	
)	
Defendants.)	
)	
)	
)	
)	

JOINT MOTION FOR EXTENSION OF TIME OF TWO DEADLINES

The parties to this case respectfully and jointly move this Court for an order (i) extending the deadline for Defendants to file an answer or motion, or otherwise respond, to Plaintiff's Complaint, from February 11, 2019, to April 11, 2019, and (ii) extending the deadline for the parties to file a Joint Status Report, from March 15, 2019, to May 14, 2019. In support of this Joint Motion, the parties state as follows:

- 1. To facilitate a potential consensual resolution of this litigation and upon joint motions filed by the parties, this Court has periodically extended the deadlines for Defendants to respond to Plaintiff's Complaint and for the parties to file a Joint Status Report. *See* Doc. Nos. 14, 18, 20, 22. Such extensions have allowed the parties to exchange documents and engage in settlement discussions.
- 2. Most recently, on November 28, 2018, through a Joint Motion, the parties sought an additional extension of the referenced deadlines to facilitate the parties' additional exchange

and review of information concerning the issues related to the parties' dispute, in anticipation of a settlement meeting. *See* Doc. No. 21.

- 3. On November 29, 2018, the Court granted the Joint Motion, setting February 11, 2019 as the deadline for Defendants' to respond to Plaintiff's Complaint and March 15, 2019 as the deadline for the parties to file a Joint Status Report. *See* Doc. No. 22.
- 4. Since then, the parties have nearly completed their exchange of information and they have continued to work toward resolving this matter.
- 5. Further, the parties now plan to meet in-person in March to discuss the information that has been exchanged over the last several months and their respective positions, with the shared hope of resolving this matter.
- 6. The parties therefore seek an additional modest extension of deadlines to allow them to prepare for the March meeting and engage in further communications that might lead to a consensual resolution of the litigation.
- 7. The proposed extension will not affect any deadlines, as there is no scheduling order in this case yet.
 - 8. All parties join this motion.

WHEREFORE, the parties jointly ask the Court to extend the deadline for Defendants to file an answer or motion, or otherwise respond, to Plaintiff's complaint from February 11, 2019, until April 11, 2019, and to extend the deadline for the filing of a Joint Status Report from March 15, 2019, to May 14, 2019.

Dated: February 8, 2019.

Respectfully submitted by:

Richards & Connor

/s/Phil R. Richards

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And

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ATTORNEYS FOR DEFENDANTS FKI INDUSTRIES INC. AND ACCO MATERIAL HANDLING SOLUTIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2019, I electronically transmitted the foregoing document to the Court Clerk using the ECF system of filing, which will transmit a Notice of Electronic Filing to the following ECF registrants:

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